UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

CRIMINAL NO.

Date: November 20, 2014

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MICHAELINA J. VAUGHAN, a/k/a

MICHAELINA CHIVERS

Defendant

THE UNITED STATES OF AMERICA CHARGES:

COUNT 1

INFORMATION

That on or about between April of 2010 and January of 2014, in Lackawanna County, within the Middle District of Pennsylvania,

MICHAELINA J. VAUGHAN, a/k/a MICHAELINA CHIVERS did knowing embezzle, steal, and purloin money of the Social Security Administration ("SSA"), a department or agency of the United States, namely, Social Security Survivor's Benefits ("SIB") payments made to her deceased mother to which she knew she was not entitled, having a value of approximately \$38,090.00

All in violation of Title 18, United States Code, § 641.

PETER J. SMITH BY TON

UNITED STATES ATTORNEY